

February 25, 2019

**VIA ELECTRONIC SUBMISSION:** <http://apps.fcc.gov/ecfs/>

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

**Re: GN Docket No. 18-357 – Reply Comment**

Dear Secretary Dortch:

The Truck and Engine Manufacturers Association (“EMA”) hereby submits reply comments on the Federal Communications Commission’s (“FCC’s”) Public Notice titled *Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band*, dated December 6, 2018 (“Public Notice”). With the Public Notice, FCC invited input on the November 21, 2018, 5G Automotive Association petition for waiver to allow the deployment of C-V2X technology within the upper 20 megahertz of the 5,850-5,925 MHz (“5.9 GHz”) frequency band (“5GAA Petition”). We offer these reply comments to endorse the comments that the American Trucking Associations (“ATA”) submitted on the Public Notice on February 8, 2019.

EMA is a trade association representing the world’s leading manufacturers of heavy-duty engines and commercial motor vehicles (with a gross vehicle weight rating greater than 10,000 pounds). EMA member companies design and produce medium- and heavy-duty vehicles that are highly customized to perform a wide variety of commercial functions, including line-haul trucking, regional trucking, package delivery, refuse hauling and construction. EMA member companies are taking active steps toward the deployment of Dedicated Short Range Communications (“DSRC”) in the 5.9 GHz band for V2X communications. One of the near-term applications of those communication technologies in commercial vehicles is platooning of two or more tractor-trailer combination vehicles. Platooning involves using DSRC communications to establish an electronic coupling to simultaneously control the acceleration and braking of the vehicles in order to safely minimize the gap between them to reduce aerodynamic drag and improve fuel efficiency.

We share the position that ATA’s comments on the Public Notice that protecting the 5.9 GHz band from interference, including all seven channels, will promote V2X innovation in the trucking and transportation industries and improve motor vehicle safety. Additionally, we agree with ATA that noninterference, interoperability, and backward compatibility of V2X communications technologies will be essential to widespread and robust deployment in the

transportation sector. Accordingly, we join ATA in requesting that FCC reject the 5GAA Petition. To avoid disrupting the DSRC deployments that are based on the exclusive use of the 5.9 GHz band, FCC must conduct rigorous testing, including real-world testing, to validate that C-V2X signals will not interfere with DSRC messages. Once that testing is complete, FCC should conduct a rulemaking proceeding to establish permanent rules for the safe coexistence of DSRC and C-V2X technologies in the 5.9 GHz band.

If you have any questions, or if there is any additional information we could provide, please do not hesitate to contact Timothy Blubaugh at (312) 929-1972, or [tblubaugh@emamail.org](mailto:tblubaugh@emamail.org).

Respectfully submitted,

TRUCK & ENGINE  
MANUFACTURERS ASSOCIATION